## 

Attorneys at Law

Nathaniel K. Charny (NY & NJ Bar) ncharny@charnywheeler.com Russell G. Wheeler rwheeler@charnywheeler.com H. Joseph Cronen icronen@charnywheeler.com



42 West Market Street Rhinebeck, NY 12572 Tel: 845-876-7500 Fax: 845-876-7501

August 5, 2025

By ECF

Hon. Jessica G.L. Clarke United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pear Street New York, New York 10007 Application GRANTED. The deadline for the parties' to submit their joint letter and proposed Civil Case Management Plan and Scheduling Order is HEREBY EXTENDED to August 7, 2025. The Clerk of Court is respectfully directed to terminate ECF No. 19.

Dated: August 6, 2025

New York, New York

SO ORDERED.

Re:

Jenna Hildenbrand v. Nuvance Health

Civ. No. 25-ev-2663 (JGLC)

Dear Judge Clarke:

JESSICA G. L. CLARKE United States District Judge

esnica Clarko

This office represents plaintiff Jenna Hildenbrand in the above-captioned matter.

I write with the consent of all parties to request an extension of time in which to file the parties' joint letter and proposed Civil Case Management Plan and Scheduling Order. Pursuant to the Court's Individual Rules and Practices in Civil Cases: (i) the original date for such filing is today, August 5, 2025, and the new date requested is August 7, 2025; (ii) - (iii) there have been no previous requests for adjournment or extension for this filing; (iv) the reason for the requested extension is the fact that my office mistakenly failed to calendar this filing; (v) counsel for Defendants consents to the request; and (vi) the date of the parties' next scheduled appearance before the Court is August 12, 2025.

I am aware of the Court's requirement that, absent emergency, any requests for extension be made at least 48 hours prior to the deadline. While the circumstances giving rise to this request might not on their face constitute an emergency, I note that at the time my office realized its calendaring error, Mr. Cronen was away on a scheduled vacation and Mr. Charny was unexpectedly out of the office due to a personal matter.

Thank you for the Court's attention to this request.

Respectfully submitted:

/s/ Russell Wheeler

Russell G. Wheeler (RW8995)

cc: All counsel of record (by ECF)